

Office of the Chapter 13 Standing Trustee

Isabel C. Balboa, Chapter 13 Standing Trustee[†]

Jane L. McDonald, Counsel
Jennifer R. Gorchow, Staff Attorney
William H. Clunn, III, Staff Attorney

*Jennie P. Archer**
*Kelleen E. Stanley**
*Lu'Shell K. Alexander**
*Kimberly Talley**

**Certified Bankruptcy Assistant*

†Fellow, American College of Bankruptcy

October 13, 2022

The Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

**RE: Chapter 13 Bankruptcy
Case No. 19-27312 (JNP)
Debtor(s) Name: Luberky A. Guerrero de Mercado**

Dear Judge Poslusny:

Please accept this letter as a limited objection to the Motion for Authorization to Enter Into Final Loan Modification Agreement, which was filed on October 12, 2022.

Secured Creditor, JPMorgan Chase Bank, N.A., through their Counsel, comes before the Court on a Motion for Authorization to Enter Into Final Loan Modification Agreement with Debtor. While the Trustee does not oppose the motion, the Trustee objects to the proposed Order.

The Trustee respectfully requests the Secured Creditor be required to submit an amended proposed Order to the Judge's chambers in accordance with the Local Mandatory Forms effective December 17, 2019. Creditor's Counsel may obtain the correct form of order from the Clerk's office or on the Court's website: www.njb.uscourts.gov/forms.

As always, the Court is welcome to contact the Trustee with any concerns.

Respectfully submitted,

/s/ Isabel C. Balboa
Isabel C. Balboa
Chapter 13 Standing Trustee

ICB/jpa

cc: Phillip Raymond, Esquire (via email)
Jenkins & Clayman (via email)
Luberky A. Guerrero de Mercado (via Regular Mail)